

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

---

DAVID MAZZA,	)
	)
	)
Plaintiff,	)
v.	)
	) Civil Act. No. 04-30020-MAP
VERIZON SICKNESS AND ACCIDENT	)
DISABILITY BENEFIT PLAN FOR	)
NEW ENGLAND ASSOCIATES, <i>et al.</i> ,	)
	)
Defendants.	)
	)

---

**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, defendants Verizon Sickness and Accident Disability Benefit Plan for New England Associates and Verizon Communications Inc., by undersigned counsel, hereby move this Court for summary judgment on the grounds that there are no genuine issues of material fact and that defendants are entitled to judgment as a matter of law. The grounds for this motion are fully set forth in the accompanying memorandum and exhibits.

Respectfully submitted on this 31st day of March, 2005:

/s/ Karen M. Wahle  
Karen M. Wahle  
O'Melveny & Myers LLP  
1625 Eye Street, N.W.  
Washington, D.C. 20006  
Tel: (202) 383-5300

Amy D. Seifer, BBO #550639  
Lisa M. Birkdale, BBO #549663  
Verizon Communications Inc.  
Legal Department  
185 Franklin Street  
Boston, MA 02110-1585  
Tel: (617) 743-5764

Attorneys for Defendants  
Verizon Communications Inc. and  
Verizon Sickness and Accident Disability  
Benefit Plan for New England Associates